

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE *EX PARTE* APPLICATION OF
Associação Nóbrega de Educação e Assistência Social
– ANEAS

Petitioner,

No. Misc.23-219

For an Order Pursuant to 28 U.S.C. § 1782 to Take
Discovery for use in Foreign Proceeding in the Federal
Republic of Brazil.

**EX PARTE APPLICATION AND PETITION FOR AN ORDER TO CONDUCT
DISCOVERY FOR USE IN FOREIGN PROCEEDINGS PURSUANT TO 28 U.S.C. §1782**

Petitioner Associação Nóbrega De Educação E Assistência Social – ANEAS, pursuant to 28 U.S.C. § 1782 and Federal Rules of Civil Procedure 26, 30, 34, and 45, respectfully applies to this Court for an order in the form attached as Exhibit A to the “Memorandum of Law in Support of *Ex Parte* Application For Order Pursuant to 28 U.S.C. § 1782 authorizing Petitioner to conduct discovery for use in foreign proceeding in the form of the subpoenas attached as Exhibit B to the same. In support of the application and petition, Petitioner submits a Memorandum of Law and attaches the Declaration of José Luiz Bayeux Neto dated July 4th, 2023 (the “Bayeux Decl.”), in addition to exhibits to the declaration.

Dated: July 4th, 2023.

Respectfully Submitted,


/s/ Gabriela M. B. Scanlon

MB SCANLON PLLC
4301 50th Street NW, 1st
Washington, D.C., 20016
Phone: (202) 410-9293
gabriela@mbscanlon.com